

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JANE DOE *et al.*,

CASE NO. 1:07cv2787

JUDGE DAN A. POLSTER

Plaintiffs

**Plaintiffs' Notice of Additional
Authority/Evidence in Support of their
Motion for Partial Summary
Judgment and In Opposition to
Defendant's Motion for Summary
Judgment Memorandum**

vs.

DEAN BOLAND

Defendant

Now come the Plaintiffs who give notice of the following authority/evidence in support of their Motion for Summary Judgment and in opposition to Defendant's Motion for Summary Judgment. Plaintiffs respectfully state that the Defendant has publically conceded and admitted on his website¹ that victims of child pornography are entitled to compensation whether or not

¹ Copy attached as Ex. 1

they are aware of the existence of the image and that mere possession of such an image will result in liability.

Respectfully submitted,

/s/ Jonathan E. Rosenbaum

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Proof of Service

A true and accurate copy of the foregoing and the attached memorandum have been electronically served this 3rd day of June, 2009 by the Court's electronic filing system

/s/ Jonathan E. Rosenbaum

JONATHAN E. ROSENBAUM

Supreme Court Reg. No. 0021698

Attorney for Plaintiffs